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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*In re:*

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**FORTY-SECOND MONTHLY FEE STATEMENT OF GILBERT LLP,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC  
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION  
CLAIMANTS FOR THE PERIOD MARCH 1, 2023 THROUGH MARCH 31, 2023**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>March 1, 2023 through March 31, 2023</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$366,032.00 (80% of \$457,540.00)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$9,253.32 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this forty-second monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing March 1, 2023 through March 31, 2023 (the “**Application Period**”).

#### **Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$457,540.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$366,032.00.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$979.51. The blended hourly rate of paraprofessionals during the Application Period is \$322.49.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$6,475.82 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$6,475.82.

4. Annexed hereto as **Exhibit D** is the summary of reasonable and necessary expenses incurred by Gilbert LLP for retained consulting experts, which have not yet been paid. Pursuant to the retention agreements applicable to these consulting experts, Gilbert LLP is not obligated to actually pay the incurred amounts until those expenses have been approved pursuant to the process mandated by the Procedures Order. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks payment for 100% of such expenses, totaling \$2,777.50. Upon receipt, Gilbert LLP will promptly pay the accrued expenses that are approved.

5. Annexed hereto as **Exhibit E** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

**FILING AND SERVICE**

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

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WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$366,032.00 (80% of \$457,540.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$9,253.32 (100%), for a total amount of \$375,285.32 for the Application Period.

Dated: May 25, 2023  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
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**Exhibit A**

**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A004	Case Administration	4.0	\$900.00
A008	Hearings	1.7	\$2,175.00
A009	Meetings / Communications with AHC	4.9	\$8,820.00
A015	Non-Working Travel (Billed @ 50%)	10.1	\$5,050.00
A019	Plan / Disclosure Statement	5.8	\$11,310.00
A020	Insurance Adversary Proceeding	476.7	\$429,285.00
		<b>503.2</b>	<b>\$457,540.00</b>

**Exhibit B**

**Summary of Compensation by Professional**



Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Special Counsel / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,950	10.8	\$21,060.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,600	36.4	\$58,240.00
Richard Leveridge	Partner / State of New York – 1997 District of Columbia – 1981 U.S. Court of Appeals for the District of Columbia – 1981 U.S. District Court for the District of Columbia – 1982 U.S. Supreme Court - 1986 U.S. Court of Appeals for the Fourth Circuit - 1988 U.S. District Court for the E. D. of New York – 1988 U.S. District Court for the S. D. of New York - 1998 U.S. District Court for the District of Maryland – 2000 U.S. Court of Appeals for the Second Circuit - 2020	\$1,600	60.4	\$96,640.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$1,000 \$500 <sup>2</sup>	83.9 10.1	\$83,900.00 \$5,050.00
Jon Dougherty	Of Counsel / State of New York – 2014 U.S. District Court for the S. D. of New York – 2014 District of Columbia – 2016 U.S. District Court for District of Wisconsin – 2017 U.S. Bankruptcy Court for the S. D. of New York – 2022	\$825	77.0	\$63,525.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$825	50.5	\$41,662.50
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$725	7.0	\$5,075.00
Alison Gaske	Associate / District of Columbia – 2016	\$725	38.9	\$28,202.50
Ifenanya Agwu	Associate / District of Columbia – 2022	\$525	46.6	\$24,465.00
December Huddleston	Associate / District of Columbia – 2021	\$525	10.0	\$5,250.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$500	8.8	\$4,400.00

<sup>2</sup> Non-working travel is billed @ 50% of regular hourly rates.

<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Alyssa Bonesteel	eDiscovery & Policy Review Coordinator – Joined firm in 2018	\$400	5.4	\$2,160.00
Nick Poz	Paralegal – Joined firm in 2022	\$350	13.6	\$4,760.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$265	4.5	\$1,192.50
Carmen Turner	Junior Paralegal – Joined firm in 2021	\$225	21.5	\$4,837.50
	<b>Totals</b>		<b>503.2</b>	<b>\$457,540.00</b>
	<b>Attorney Blended Rate</b>	<b>\$979.51</b>		
	<b>Paraprofessional Blended Rate</b>	<b>\$322.49</b>		

**Exhibit C**

**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Contracted Professional Fees – Litigation Support Vendors	\$1,989.50
Depositions / Transcripts	\$2,435.70
Messenger & Delivery	\$222.15
Travel – Lodging	\$939.76
Travel – Meals	\$87.64
Travel – Parking	\$50.00
Travel – Taxi fare	\$95.07
Travel – Train Fare	\$656.00
<b>Total</b>	<b>\$6,475.82</b>

**Exhibit D**

**Summary of Expenses Incurred and Not Yet Paid**

**SUMMARY OF EXPENSES INCURRED BUT NOT YET PAID**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Insurance Consulting Expert A	\$2,777.50
<b>Total</b>	<b>\$2,777.50</b>

**Exhibit E**

**Time and Expense Detail**

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Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

May 2, 2023  
Invoice Number: 11330079  
Client Number: 1599  
Tax ID: 52-2283869

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**FOR PROFESSIONAL SERVICES RENDERED through March 31, 2023**

**Re: Ad Hoc Committee (Purdue)**

<b>Matter Description</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
Purdue Bankruptcy	457,540.00	6,475.82	464,015.82
<b>Total</b>	<b>457,540.00</b>	<b>6,475.82</b>	<b>464,015.82</b>

TOTAL FEES \$ 457,540.00

TOTAL EXPENSES \$ 6,475.82

**TOTAL FEES AND EXPENSES \$ 464,015.82**



**FOR PROFESSIONAL SERVICES RENDERED through March 31, 2023****Purdue Bankruptcy****A004: Case Administration**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Turner, C.	3/01/23	Review court docket for recent insurance-related filings.	.70	157.50
Turner, C.	3/06/23	Review court docket for recently filed insurance-related pleadings.	1.00	225.00
Turner, C.	3/20/23	Review court docket for recent insurance-related filings.	1.10	247.50
Turner, C.	3/27/23	Review court docket for recently filed pleadings.	1.20	270.00
<b>Project Total:</b>			<b>4.00</b>	<b>\$ 900.00</b>

**A008: Hearings**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	3/21/23	Attend omnibus hearing.	.50	975.00
Rubinstein, J.	3/21/23	Review agenda and related materials in preparation for omnibus hearing (0.7); attend omnibus hearing (0.5).	1.20	1,200.00
<b>Project Total:</b>			<b>1.70</b>	<b>\$ 2,175.00</b>

**A009: Meetings / Communications with AHC**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	3/14/23	Confer with AHC working group re strategy.	.80	1,560.00
Shore, R.	3/14/23	Review issues in preparation for call with AHC working group re updated litigation/arbitration strategy.	.50	800.00
Shore, R.	3/14/23	Confer with AHC re litigation/arbitration strategy.	.80	1,280.00
Leveridge, R.	3/14/23	Confer with AHC working group re strategy recommendations.	.80	1,280.00
Gilbert, S.	3/24/23	Confer with AHC and fifteen working groups re strategy options.	1.50	2,925.00
Gilbert, S.	3/30/23	Confer with AHC working group re status.	.50	975.00
<b>Project Total:</b>			<b>4.90</b>	<b>\$ 8,820.00</b>

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**A015: Non-Working Travel (Billed @ 50%)**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Rubinstein, J.	3/01/23	Travel from Washington, DC to New York, NY for depositions (train delayed).	5.60	2,800.00
Rubinstein, J.	3/02/23	Travel from New York, NY to Washington, DC after depositions.	4.50	2,250.00
<b>Project Total:</b>			<b>10.10</b>	<b>\$ 5,050.00</b>

**A019: Plan / Disclosure Statement**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	3/06/23	Review Kramer strategy outline (0.9); confer with counsel re same (0.6).	1.50	2,925.00
Gilbert, S.	3/09/23	Confer with counsel and financial advisors re projections re alternative options.	1.00	1,950.00
Gilbert, S.	3/10/23	Review and revise Kramer deck re alternative options.	2.30	4,485.00
Gilbert, S.	3/15/23	Review strategy outline (0.4); confer with co-counsel re same (0.6).	1.00	1,950.00
<b>Project Total:</b>			<b>5.80</b>	<b>\$ 11,310.00</b>

**A020: Insurance Adversary Proceeding**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Shore, R.	3/01/23	Analysis of co-counsel material re Issue #69.	.50	800.00
Shore, R.	3/01/23	Confer with co-counsel and R. Leveridge re Issue #69.	1.20	1,920.00
Shore, R.	3/01/23	Analyze Issue #69 process.	.40	640.00
Rubinstein, J.	3/01/23	Attend deposition of E. Osborne (3.7); review correspondence re Issue #69 (0.6); review materials in preparation for Deponent #19 and #21 depositions (1.8); confer with co-counsel re strategy (1.5); provide comments to co-counsel re discovery letter re privilege logs (0.3).	7.90	7,900.00
Rush, M.	3/01/23	Review Insurer #25 supplemental production.	.50	412.50
Gaske, A.	3/01/23	Continue reviewing materials in preparation for deposition of Deponent #4.	.60	435.00
Gaske, A.	3/01/23	Attend deposition of P. Morin.	3.60	2,610.00
Gaske, A.	3/01/23	Review materials in preparation for P. Morin deposition.	1.40	1,015.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	3/01/23	Communicate with J. Rubinstein re covering deposition of E. Osborne while his train was broken down.	.30	480.00
Leveridge, R.	3/01/23	Attend E. Osborne deposition (partial attendance until J. Rubinstein arrived).	1.10	1,760.00
Leveridge, R.	3/01/23	Review materials re Issue #69.	.60	960.00
Leveridge, R.	3/01/23	Confer with co-counsel and R. Shore re Issue #69 (1.2); communicate with co-counsel re communications with counsel for Insurer #2 re same (0.7); communicate with R. Shore re same (0.2).	2.10	3,360.00
Leveridge, R.	3/01/23	Communicate with M. Rush re status of Insurer #25 supplemental production.	.30	480.00
Leveridge, R.	3/01/23	Communicate with Consulting Expert A re analysis.	.30	480.00
Leveridge, R.	3/01/23	Review draft letter memorializing meet-and-confer (0.4); communicate with M. Rush and J. Rubinstein re same (0.2).	.60	960.00
Turner, C.	3/01/23	Review and organize underlying complaints.	.30	67.50
Turner, C.	3/01/23	Communicate with A. Gaske re P. Morin deposition.	.10	22.50
Huddleston, D.	3/01/23	Continue reviewing drafting history documents re Issue #66.	1.00	525.00
Agwu, I.	3/01/23	Research publicly available information re Insurer #36.	4.00	2,100.00
Poz, N.	3/01/23	Communicate with team re E. Osborne deposition.	.20	70.00
Poz, N.	3/01/23	Attend (remotely) deposition of E. Osborne deposition to assist with exhibits.	3.50	1,225.00
Poz, N.	3/01/23	Communicate with team re supplemental production of Insurer #25.	.10	35.00
Poz, N.	3/01/23	Continue updating master tracking list of exhibits used at depositions.	.30	105.00
Dougherty, J.	3/01/23	Review case law cited in legal memorandum (2.3); revise legal memorandum re same (1.0).	3.30	2,722.50
Shore, R.	3/02/23	Confer with co-counsel re Issue #69 strategy.	.40	640.00
Rubinstein, J.	3/02/23	Attend Aspen Rule 30(b)(1) deposition (3.5); confer with co-counsel re various issues (1.0); confer with co-counsel re Issue #69 (0.8).	5.30	5,300.00
Rush, M.	3/02/23	Review deposition transcripts of Insurer #15 witnesses.	2.10	1,732.50
Gaske, A.	3/02/23	Attend deposition of P. Morin.	3.00	2,175.00
Gaske, A.	3/02/23	Review materials in preparation for deposition of P. Morin.	1.00	725.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	3/02/23	Communicate with co-counsel re status of extension request re Issue #69 (0.3); confer with co-counsel re strategy re adversary proceeding, expert work and Issue #69 (1.1).	1.40	2,240.00
Leveridge, R.	3/02/23	Review documents and communications re Issue #69 (1.1); communicate with co-counsel re same (0.2).	1.30	2,080.00
Leveridge, R.	3/02/23	Review material from co-counsel re underlying litigation.	.40	640.00
Leveridge, R.	3/02/23	Review discovery requests from Insurers #18, #19, and #20.	.40	640.00
Leveridge, R.	3/02/23	Review analysis from Consulting Expert A (1.6); communicate with team re same (0.4); communicate with Consulting Expert A re same (0.4).	2.40	3,840.00
Leveridge, R.	3/02/23	Review communications from counsel for Insurer #25 re discovery issues.	.20	320.00
Ogrey, S.	3/02/23	Review correspondence sent to Court re Insurer #2.	1.20	318.00
Sraders, S.	3/02/23	Review additional potential deponents for Insurer #24.	.80	580.00
Turner, C.	3/02/23	Attend deposition of P. Morin to assist with exhibits.	2.80	630.00
Turner, C.	3/02/23	Review and organize P. Morin deposition exhibits.	.50	112.50
Agwu, I.	3/02/23	Continue researching publicly available information re Insurer #35.	3.00	1,575.00
Dougherty, J.	3/02/23	Continue review of case law cited in memorandum tracking legal issues in case (2.2); revise memorandum re same (1.2).	3.40	2,805.00
Shore, R.	3/03/23	Communicate with R. Leveridge and J. Rubinstein re sample of Consulting Expert A analysis.	.20	320.00
Girgenti, J.	3/03/23	Draft updated policy information chart.	3.30	1,320.00
Girgenti, J.	3/03/23	Review and code policies to be included in updated information chart.	2.60	1,040.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	3/03/23	Review proposed Navigators' stipulation and amended affirmative defenses (0.6); review discovery correspondence (0.5); continue reviewing materials in preparation for Deponents #19 and #21 depositions (0.7); confer with R. Leveridge re multiple litigation strategy issues (1.1); review Consulting Expert A analysis (0.3); analyze Issue #69 strategy (0.2); analysis re potential Rule 30(b)(1) deponents for Insurers #5 and #24 (0.2); review status of policy language analysis (0.2); review potential expert recommendation (0.2); communicate with team re potential fact discovery investigation (0.2).	4.20	4,200.00
Rush, M.	3/03/23	Draft letter to Insurer #25 re discovery.	4.40	3,630.00
Bonesteel, A.	3/03/23	Review loadfiles for policy review database.	.60	240.00
Gaske, A.	3/03/23	Analyze policy language report.	.90	652.50
Gaske, A.	3/03/23	Review revised Liberty proposed policy stipulation.	.30	217.50
Leveridge, R.	3/03/23	Review correspondence from co-counsel re status of outstanding litigation projects, discovery issues, and strategy issues being addressed collectively by plaintiffs (0.4); confer with J. Rubinstein re same (1.1).	1.50	2,400.00
Leveridge, R.	3/03/23	Communicate with J. Rubinstein and S. Sraders re additional insurer deponents (0.3); review S. Sraders' communication to co-counsel (0.1).	.40	640.00
Leveridge, R.	3/03/23	Communicate with A. Gaske, J. Rubinstein, and B. Hubbard re policy review project and sharing work product with co-counsel.	.40	640.00
Leveridge, R.	3/03/23	Communicate with co-counsel re sample of Consulting Expert A analysis (0.2); communicate with R. Shore and J. Rubinstein re same (0.2); communicate with Consulting Expert A re same (0.4).	.80	1,280.00
Leveridge, R.	3/03/23	Communicate with co-counsel re prospective expert in case.	.20	320.00
Leveridge, R.	3/03/23	Review and revise draft letter to counsel for Insurer #25 re discovery issues with searches and production of documents.	.30	480.00
Sraders, S.	3/03/23	Communicate with co-counsel, R. Leveridge, and J. Rubinstein re potential deponents for Insurers #5 and #24.	.70	507.50
Hubbard, B.	3/03/23	Review and revise full language report of all policy language provisions to identify any issues in coding.	4.60	2,300.00
Huddleston, D.	3/03/23	Continue reviewing drafting history documents re Issue #66.	1.90	997.50

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Name	Date	Services	Hours	Amount
Agwu, I.	3/03/23	Continue researching publicly available documents re Insurers #3, #5 and #6.	5.00	2,625.00
Dougherty, J.	3/03/23	Review recent deposition transcripts re key issues in litigation.	2.30	1,897.50
Shore, R.	3/06/23	Confer with counsel for Debtors and UCC re Issue #69.	1.40	2,240.00
Shore, R.	3/06/23	Confer with R. Leveridge and J. Rubinstein re strategy re Issue #69.	.50	800.00
Shore, R.	3/06/23	Review and revise memorandum re Issue #52	3.00	4,800.00
Rubinstein, J.	3/06/23	Analysis re Consulting Expert A work (0.1); confer with R. Shore and R. Leveridge re strategy (0.5); confer with co-counsel re Issue #69 (1.4); communicate with team re same (0.2).	2.20	2,200.00
Rush, M.	3/06/23	Review deposition transcripts of Insurer #15 witnesses.	4.60	3,795.00
Gaske, A.	3/06/23	Review execution version of Liberty policy stipulation.	1.80	1,305.00
Leveridge, R.	3/06/23	Draft litigation update.	.30	480.00
Leveridge, R.	3/06/23	Confer with R. Shore and J. Rubinstein re status of litigation and issues to be addressed with co-counsel.	.50	800.00
Leveridge, R.	3/06/23	Confer with Debtors' counsel, UCC counsel, R. Shore, J. Rubinstein, and S. Sraders re legal issues implicated re Issue #69.	1.40	2,240.00
Leveridge, R.	3/06/23	Communicate with Consulting Expert A re potential meeting to go over projects.	.30	480.00
Leveridge, R.	3/06/23	Review transcript of a case in which insurers made representations relevant to issues arising in this case.	1.30	2,080.00
Leveridge, R.	3/06/23	Analyze strategic issues in case.	.40	640.00
Sraders, S.	3/06/23	Confer with co-counsel re Issue #69.	1.30	942.50
Sraders, S.	3/06/23	Analyze transcript re Issue #68.	.20	145.00
Turner, C.	3/06/23	Review and organize Liberty policies in support of policy stipulation.	4.80	1,080.00
Agwu, I.	3/06/23	Continue researching publicly available documents for Insurers #1, #18, #19 and #20.	5.00	2,625.00
Shore, R.	3/07/23	Confer with C. Litherland and J. Rubinstein re Issue #69 strategy.	.60	960.00
Shore, R.	3/07/23	Analysis re Issue #69 issues.	.60	960.00

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Rubinstein, J.	3/07/23	Communicate with J. Dougherty re open projects (0.2); confer with S. Sraders re deposition scheduling (0.2); correspond with A. Gaske re deposition follow up discovery correspondence (0.2); confer with C. Litherland and R. Shore re Issue #69 strategy (0.6); analysis re Issue #69 (0.4); review Insurer #33 discovery correspondence (0.1); revise discovery letter to Insurer #25 (0.5); review Insurers #18, #19, and #20 request for production (0.3); review discovery materials re offensive discovery (0.8); analysis re Issue #68 (0.3).	3.60	3,600.00
Rush, M.	3/07/23	Review deposition transcripts of Insurer #15 witnesses.	1.60	1,320.00
Rush, M.	3/07/23	Revise discovery letter to Insurer #25.	.50	412.50
Gaske, A.	3/07/23	Review final version of Liberty policy stipulation.	.70	507.50
Gaske, A.	3/07/23	Analyze letter from Insurer #33 re document production.	.50	362.50
Leveridge, R.	3/07/23	Review communications with insurers re discovery.	.40	640.00
Leveridge, R.	3/07/23	Communicate with J. Rubinstein re Issue #69 strategy.	.30	480.00
Sraders, S.	3/07/23	Confer with J. Rubinstein re upcoming insurer depositions.	.20	145.00
Sraders, S.	3/07/23	Confer with insurers re additional depositions.	.80	580.00
Turner, C.	3/07/23	Continue review and organization of Liberty policies in support of policy stipulation.	5.20	1,170.00
Agwu, I.	3/07/23	Continue researching publicly available documents for Insurers #24 and #25.	5.00	2,625.00
Poz, N.	3/07/23	Review and organize transcripts of Deponents #4 and #5 depositions.	.20	70.00
Poz, N.	3/07/23	Update correspondence tracker re Insurer #33 communications.	.20	70.00
Poz, N.	3/07/23	Review case docket and briefing materials re Insurer #2.	.40	140.00
Poz, N.	3/07/23	Organize Insurer #33 supplemental production.	.50	175.00
Shore, R.	3/08/23	Review and revise Navigators' stipulation.	.50	800.00
Girgenti, J.	3/08/23	Communicate with R. Leveridge, R. Shore, J. Rubinstein, A. Gaske, B. Hubbard, and N. Poz re review of policy language.	.10	40.00

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Rubinstein, J.	3/08/23	Analysis re potential Navigators' stipulation (1.2); review draft letter to Navigators' counsel re same (0.3); review discovery correspondence from insurers re Debtors' privilege logs (0.2); communicate with A. Gaske re multiple policy stipulations (0.3); continue review of transcript relevant to Issue #68 (2.5); analysis re strategy for discussion with co-counsel (0.5).	5.00	5,000.00
Rush, M.	3/08/23	Review letter from insurer re privilege issues.	.10	82.50
Rush, M.	3/08/23	Review Navigators' proposed amended answer.	.50	412.50
Gaske, A.	3/08/23	Correspond with A. Crawford re Liberty policy stipulation.	.20	145.00
Gaske, A.	3/08/23	Analyze next steps for reaching policy stipulations with remaining insurers.	1.00	725.00
Gaske, A.	3/08/23	Review tracking of policy provisions.	1.50	1,087.50
Leveridge, R.	3/08/23	Review spreadsheet re policy terms (0.7); communicate with A. Gaske and J. Girgenti re same (0.4).	1.10	1,760.00
Leveridge, R.	3/08/23	Review communications between Debtors' counsel and insurer counsel re discovery issues (0.7); communicate with Debtors' counsel re same (0.5).	1.20	1,920.00
Sraders, S.	3/08/23	Review transcript of Deponent #18 deposition.	.60	435.00
Hubbard, B.	3/08/23	Prepare language provision report re supplementing analyzed language for co-counsel.	3.40	1,700.00
Huddleston, D.	3/08/23	Continue analyzing drafting history materials re Issue #66.	3.80	1,995.00
Agwu, I.	3/08/23	Continue researching publicly available documents for Insurers #15, #23 and #27.	5.00	2,625.00
Poz, N.	3/08/23	Review and organize co-plaintiffs' 47th supplemental production.	.50	175.00
Dougherty, J.	3/08/23	Review drafting history documents re Issue #66.	.80	660.00
Shore, R.	3/09/23	Confer with co-counsel re strategy re Issue #69.	.90	1,440.00
Shore, R.	3/09/23	Confer with team re case status, strategy and next steps.	.80	1,280.00
Girgenti, J.	3/09/23	Confer with team re case update and strategy.	.80	320.00
Rubinstein, J.	3/09/23	Draft litigation task list (0.8); confer with team re case status and strategy (0.8); participate in call with co-counsel re strategy (0.9); correspond with A. Gaske re Insurer #33 production analysis and policy stipulation (0.3); review Navigators' response to Leopold claim (0.2); analysis re Issue #68 (1.3); review update from J. Dougherty re policy language analysis (0.2); confer with R. Leveridge re Issue #69 (0.5).	5.00	5,000.00



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Name	Date	Services	Hours	Amount
Rush, M.	3/09/23	Communicate with R. Shore and I. Agwu re Issue #14.	.30	247.50
Rush, M.	3/09/23	Confer with team re case status and strategy.	.80	660.00
Rush, M.	3/09/23	Draft correspondence to Insurer #25 re depositions.	.20	165.00
Gaske, A.	3/09/23	Confer with team re strategy and next steps.	.80	580.00
Gaske, A.	3/09/23	Analyze transcript of Deponent #5 deposition to determine any next discovery-related steps.	.60	435.00
Gaske, A.	3/09/23	Analyze transcript of Deponent #4 deposition to determine next discovery-related steps.	1.20	870.00
Gaske, A.	3/09/23	Analyze documents produced by Insurer #33.	1.10	797.50
Gaske, A.	3/09/23	Correspond with counsel for Gulf, St. Paul, and National Union re policy stipulations.	.40	290.00
Gaske, A.	3/09/23	Correspond with J. Girgenti, B. Hubbard and N. Poz re policy language.	.80	580.00
Leveridge, R.	3/09/23	Review communication from J. Dougherty re drafting history research re Issue #66.	.30	480.00
Leveridge, R.	3/09/23	Review legal research re Issue #69.	1.30	2,080.00
Leveridge, R.	3/09/23	Confer with co-counsel re adversary proceeding and Issue #69 issues (0.9); confer with J. Rubinstein re same (0.5).	1.40	2,240.00
Leveridge, R.	3/09/23	Confer with team re litigation status and next steps.	.80	1,280.00
Ogrey, S.	3/09/23	Confer with team re case status and strategy.	.80	212.00
Sraders, S.	3/09/23	Analyze case law and transcript re Issue #68.	.80	580.00
Turner, C.	3/09/23	Confer with team re litigation strategy and case updates.	.80	180.00
Hubbard, B.	3/09/23	Confer with team re status and strategy.	.80	400.00
Huddleston, D.	3/09/23	Confer with team re case status and strategy.	.80	420.00
Huddleston, D.	3/09/23	Continue analyzing documents re Issue #66.	2.20	1,155.00
Agwu, I.	3/09/23	Confer with team re case update and strategy.	.80	420.00
Agwu, I.	3/09/23	Continue researching publicly available documents for Insurers #27 and #30.	3.50	1,837.50
Poz, N.	3/09/23	Review and identify relevant language in policies.	3.80	1,330.00
Poz, N.	3/09/23	Confer with team re case status and next steps.	.80	280.00
Dougherty, J.	3/09/23	Communicate with D. Huddleston re review of briefing filed in other cases re Issue #66.	.60	495.00
Shore, R.	3/10/23	Confer with R. Leveridge and J. Rubinstein re Issue #69.	.70	1,120.00
Girgenti, J.	3/10/23	Review and code certain policies.	1.70	680.00
Girgenti, J.	3/10/23	Revise spreadsheet re certain policies.	1.60	640.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	3/10/23	Analysis re Issue #69 strategy (0.4); confer with Debtors' counsel, UCC counsel and R. Leveridge re same (1.1); confer with R. Leveridge re same (0.3); confer with R. Leveridge and R. Shore re same (0.7); analysis re Issue #14 (0.2); correspond with A. Gaske re follow up discovery resulting from depositions of Deponents #4 and #5 (0.2); correspond with A. Gaske re coordinating multiple policy stipulation follow-up calls (0.2); review insurer specific discovery research from I. Agwu (0.5).	3.60	3,600.00
Rush, M.	3/10/23	Communicate with R. Leveridge re Issue #14.	.20	165.00
Gaske, A.	3/10/23	Correspond with counsel for National Union, Gulf, and St. Paul re policy stipulation.	.50	362.50
Leveridge, R.	3/10/23	Confer with Debtors' counsel, UCC counsel and J. Rubinstein re issues relating to Issue #69 (1.1); confer with J. Rubinstein re follow up to same (0.2); review communication from Debtors' counsel re same (0.2); communicate with R. Shore and J. Rubinstein re same (0.4); confer with UCC counsel (A. Crawford) re same (0.4).	2.30	3,680.00
Sraders, S.	3/10/23	Analyze transcript of Deponent #18 deposition for potential follow-up.	.50	362.50
Gilbert, S.	3/13/23	Confer with R. Shore, R. Leveridge and J. Rubinstein re insurance issues and strategy.	.80	1,560.00
Shore, R.	3/13/23	Confer with J. Rubinstein and R. Leveridge re strategy.	.90	1,440.00
Shore, R.	3/13/23	Confer with S. Gilbert, J. Rubinstein, and R. Leveridge re Issue #69.	.80	1,280.00
Shore, R.	3/13/23	Confer with A. Gaske re draft agreement with Insurer #12.	.20	320.00
Shore, R.	3/13/23	Review letter re Issue #69.	.30	480.00
Shore, R.	3/13/23	Communicate with team re Issue #14.	.10	160.00
Girgenti, J.	3/13/23	Continue reviewing and coding certain policies.	3.90	1,560.00
Girgenti, J.	3/13/23	Revise spreadsheet re certain policies.	3.80	1,520.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	3/13/23	Review updated deposition tracking chart (0.1); review correspondence with various insurers re policy stipulations (0.1); review emails re Issue #69 strategy (0.2); confer with R. Shore and R. Leveridge re strategy (1.0); confer with R. Leveridge re follow up to same (0.4); analysis re open discovery correspondence (0.5); analysis re offensive depositions (0.8); confer with S. Gilbert, R. Shore, and R. Leveridge re insurance strategy and Issue #69 (0.8); review Debtors' counsel proposed edits to discovery correspondence to Insurer #25 (0.2).	4.10	4,100.00
Gaske, A.	3/13/23	Confer with R. Shore re draft agreement with Insurer #12.	.20	145.00
Gaske, A.	3/13/23	Confer with insurers re policy stipulation status (0.3); confer with XLIA counsel re status of privilege log (0.2).	.50	362.50
Leveridge, R.	3/13/23	Confer with R. Shore and J. Rubinstein re developments in coverage matter and related projects (0.9); confer with J. Rubinstein re follow up to same (0.2).	1.10	1,760.00
Leveridge, R.	3/13/23	Communications with P. Breene re strategic issues in coverage proceedings.	.60	960.00
Leveridge, R.	3/13/23	Confer with S. Gilbert, R. Shore and J. Rubinstein re adversary proceeding strategy and issues.	.80	1,280.00
Agwu, I.	3/13/23	Continue researching publicly available documents for Insurers #33 and #35.	4.00	2,100.00
Dougherty, J.	3/13/23	Continue reviewing recent rulings and case law re relevant issues in adversary proceeding (2.8); revise memorandum tracking same (2.0).	4.80	3,960.00
Shore, R.	3/14/23	Confer with R. Leveridge re update to client and outreach to plaintiffs re litigation strategy.	.30	480.00
Shore, R.	3/14/23	Review and comment on memorandum re Issue #52.	4.40	7,040.00
Rubinstein, J.	3/14/23	Communicate with M. Rush re discovery letters (0.3); review Insurers #18, #19, and #20 response to letter re Rule 30(b)(6) depositions (1.5); communicate with A. Gaske re National Union policy stipulation (0.1); confer with National Union re same (0.1); review discovery correspondence among co-counsel and insurer defendants (0.3); correspond with co-counsel re deposition scheduling (0.2).	2.50	2,500.00
Rush, M.	3/14/23	Revise letter to Insurer #25 re discovery issues.	1.50	1,237.50

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Name	Date	Services	Hours	Amount
Rush, M.	3/14/23	Analyze Insurers #18, #19, and #20 response to Rule 30(b)(6) letter.	4.40	3,630.00
Gaske, A.	3/14/23	Confer with National Union re policy stipulation status.	.10	72.50
Leveridge, R.	3/14/23	Communicate with J. Rubinstein and M. Rush re discovery issues (0.2); review communications from co-counsel and opposing counsel re same (0.4).	.60	960.00
Ogrey, S.	3/14/23	Revise letter to Insurer #25 re outstanding discovery requests.	.50	132.50
Agwu, I.	3/14/23	Continue researching publicly available documents for Insurers #33 and #35.	4.00	2,100.00
Poz, N.	3/14/23	Review and organize discovery letter from Insurer #18.	.20	70.00
Shore, R.	3/15/23	Analysis re Issue #69.	1.40	2,240.00
Rubinstein, J.	3/15/23	Confer with team re factual research relevant to offensive discovery (0.4); confer with R. Leveridge and M. Rush re same (0.8); communicate with team re response to Insurers #18, #19, and #20 re offensive Rule 30(b)(6) letter (0.9); correspond with co-plaintiffs re Issue #69 (0.4).	2.50	2,500.00
Rush, M.	3/15/23	Confer with R. Leveridge, J. Rubinstein, and I. Agwu re discovery.	.40	330.00
Rush, M.	3/15/23	Draft letter to Insurers #18, #19, and #20 re Rule 30(b)(6) objections.	3.20	2,640.00
Rush, M.	3/15/23	Confer with R. Leveridge and J. Rubinstein re Rule 30(b)(6) objections.	.80	660.00
Bonesteel, A.	3/15/23	Prepare deposition transcripts to be loaded to Relativity for further review.	.90	360.00
Gaske, A.	3/15/23	Correspond with A. Crawford re Liberty policy stipulation.	.10	72.50
Gaske, A.	3/15/23	Revise proposed policy stipulation pages for Gulf and St. Paul policy stipulation.	.30	217.50
Leveridge, R.	3/15/23	Confer with J. Rubinstein, M. Rush, and I. Agwu re discovery issues (0.4); confer with M. Rush and J. Rubinstein re Rule 30(b)(6) issues (0.8).	1.20	1,920.00
Leveridge, R.	3/15/23	Communicate with co-counsel, R. Shore, and J. Rubinstein re Issue #69.	1.40	2,240.00
Leveridge, R.	3/15/23	Review communications between co-counsel and opposing counsel re discovery and proposed amendment of answer.	.30	480.00
Agwu, I.	3/15/23	Confer with R. Leveridge, J. Rubinstein, and M. Rush re research re Issue #1.	.40	210.00

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Name	Date	Services	Hours	Amount
Agwu, I.	3/15/23	Draft requests for production of documents for Insurer #18.	2.50	1,312.50
Dougherty, J.	3/15/23	Continue reviewing recent rulings and case law re relevant issues in adversary proceeding (3.8); update memorandum re recent events (2.6).	6.40	5,280.00
Rubinstein, J.	3/16/23	Review issues in preparation for meet-and-confer discussion with St. Paul/Gulf counsel re policy stipulation (0.4); participate in meet-and-confer with St. Paul/Gulf counsel re same (0.4); follow up correspondence re draft stipulation (0.2); provide comments on draft letter re Issue #69 (0.4); communicate with co-counsel re scheduling and multiple substantive litigation issues (0.6); review Navigators' proposed changes to stipulation (0.2); revise draft written discovery to Insurers #18, #19, and #20 (0.9).	3.10	3,100.00
Rush, M.	3/16/23	Continue drafting letter to Insurers #18, #19 and #20 re Rule 30(b)(6) objections.	4.20	3,465.00
Gaske, A.	3/16/23	Confer with counsel for St. Paul and Gulf and J. Rubinstein re St. Paul and Gulf policy stipulation.	.40	290.00
Gaske, A.	3/16/23	Revise draft template policy stipulation for St. Paul and Gulf (0.4); communicate with counsel for St. Paul and Gulf re same (0.2); revise portion of National Union policy comparison spreadsheet re policy stipulation (0.9).	1.50	1,087.50
Leveridge, R.	3/16/23	Communicate with co-counsel re Issue #69 (0.6); analysis re same (0.6).	1.20	1,920.00
Agwu, I.	3/16/23	Continue drafting requests for production of documents for Insurer #18.	3.50	1,837.50
Poz, N.	3/16/23	Review and organize final transcript of Deponent #4 deposition and exhibits.	.40	140.00
Dougherty, J.	3/16/23	Continue reviewing recent rulings and case law re relevant issues in adversary proceeding (4.5); revise memorandum re recent rulings (4.2).	8.70	7,177.50
Shore, R.	3/17/23	Confer with co-counsel, R. Leveridge, and J. Rubinstein re strategic issues.	.50	800.00
Shore, R.	3/17/23	Confer with R. Leveridge re strategic issues.	.20	320.00
Shore, R.	3/17/23	Review and revise notice re Issue #69.	.20	320.00
Shore, R.	3/17/23	Review stipulation with Navigators and provide comments.	.60	960.00
Shore, R.	3/17/23	Communicate with K. Maclay re adversary proceeding update.	.10	160.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	3/17/23	Confer with co-counsel, R. Shore and R. Leveridge re strategy (0.5); communicate with team re same (0.3).	.80	800.00
Rush, M.	3/17/23	Continue drafting letter to Insurers #18, #19, and #20 re Rule 30(b)(6) objections.	4.60	3,795.00
Leveridge, R.	3/17/23	Communicate with A. Kramer re status of discussions with co-counsel on strategic issues (0.4); communicate with team re same (0.3); confer with Debtors' counsel, UCC counsel, R. Shore, and J. Rubinstein re strategic issues (0.5); confer with R. Shore re follow up to same (0.2).	1.40	2,240.00
Leveridge, R.	3/17/23	Review communication from A. Fleischer (opposing counsel) re certain insurers' position re plaintiffs' Rule 30(b)6 deposition topics.	.30	480.00
Leveridge, R.	3/17/23	Review communications between Debtors' counsel and Navigators' counsel re amended pleadings (0.2); communicate with R. Shore and J. Rubinstein re same (0.3); communicate with co-counsel re same (0.2).	.70	1,120.00
Poz, N.	3/17/23	Organize communications re Insurers #2, #9, #25.	.30	105.00
Dougherty, J.	3/17/23	Continue reviewing recent rulings and case law re relevant issues in adversary proceeding (3.4); revise memorandum re same (3.1).	6.50	5,362.50
Dougherty, J.	3/18/23	Continue reviewing recent rulings and case law re relevant issues in adversary proceeding (2.4); update memorandum to reflect recent changes (2.1).	4.50	3,712.50
Dougherty, J.	3/19/23	Continue reviewing recent rulings and case law re relevant issues in adversary proceeding (2.2); revise memorandum re recent rulings (2.0).	4.20	3,465.00
Shore, R.	3/20/23	Confer with R. Leveridge and J. Rubinstein re adversary proceeding strategy.	1.30	2,080.00
Rubinstein, J.	3/20/23	Review agenda re March 21 omnibus hearing (0.5); provide comments on co-plaintiff document re various strategic issues in the adversary proceeding (0.3); analysis re deposition summaries (0.2); confer with R. Leveridge and R. Shore re adversary proceeding strategy (1.3); revise discovery letter to Insurer #23 (0.2); confer with team re discovery (0.7); review co-counsel correspondence re Navigators' stipulation (0.3); revise requests for production to Insurers #18, #19, and #20 (0.5); analysis of National Union policy comparison analysis for policy stipulation (0.6); review updated opioid case law tracking analysis (0.5).	5.10	5,100.00
Rush, M.	3/20/23	Draft additional discovery requests to insurers.	1.50	1,237.50

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Name	Date	Services	Hours	Amount
Gaske, A.	3/20/23	Review documents produced by Insurer #23 re potential additional deponents.	1.10	797.50
Gaske, A.	3/20/23	Revise National Union policy comparison spreadsheet re policy stipulations.	1.10	797.50
Gaske, A.	3/20/23	Draft letter to Insurer #23 re document production.	1.60	1,160.00
Leveridge, R.	3/20/23	Review draft talking points from Debtors' counsel for strategy call (0.7); review comments from R. Shore and J. Rubinstein re same (0.6); confer with R. Shore and J. Rubinstein re same (0.5); review additional edits from co-counsel (0.2); revise talking points (0.9).	2.90	4,640.00
Leveridge, R.	3/20/23	Review revised discovery requests to Insurers #18, #19, and #20.	.30	480.00
Sraders, S.	3/20/23	Correspond with J. Rubinstein re upcoming depositions.	.10	72.50
Poz, N.	3/20/23	Organize Insurer #25 supplemental production/reproduction, relevant correspondence, and redaction log.	.80	280.00
Rubinstein, J.	3/21/23	Revise letter to Insurers #18, #19, and #20 re Rule 30(b)(6) deposition (1.3); review correspondence to Insurer #23 re document production (0.1); review Insurers #9, #23, and #25 letters re Rule 30(b)(6) and provide comments re same (2.4); confer with A. Gaske re National Union policy stipulation analysis (0.7); review correspondence from counsel for Navigators re Debtors' productions and stipulation re amended answer and affirmative defenses (0.2); review correspondence from co-counsel re strategy (0.2).	4.90	4,900.00
Rush, M.	3/21/23	Continue drafting letter to Insurers #18, #19, and #20 re Rule 30(b)(6) objections.	2.00	1,650.00
Gaske, A.	3/21/23	Confer with J. Rubinstein re National Union policy comparison spreadsheet (0.7); revise National Union policy comparison spreadsheet (1.5).	2.20	1,595.00
Gaske, A.	3/21/23	Finalize and send letter to NAE re document production.	.40	290.00
Leveridge, R.	3/21/23	Review communications with opposing counsel re discovery issues.	.70	1,120.00
Leveridge, R.	3/21/23	Communicate with co-counsel re strategy issues relating to schedule.	.60	960.00
Sraders, S.	3/21/23	Confer with insurers and J. Rubinstein re upcoming Rule 30(b)(1) depositions.	.30	217.50
Poz, N.	3/21/23	Communicate with Veritext re transcript of Deponent #5 deposition.	.20	70.00

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Name	Date	Services	Hours	Amount
Shore, R.	3/22/23	Communicate with R. Leveridge re strategy issues.	.30	480.00
Shore, R.	3/22/23	Review outline of litigation issues in preparation for call with co-counsel (0.9); confer with co-counsel re litigation strategy and next steps (0.6).	1.50	2,400.00
Rubinstein, J.	3/22/23	Confer with J. Dougherty re offensive litigation strategy projects (0.7); confer with co-counsel re litigation strategy (0.6); analysis re National Union policy stipulation (0.3).	1.60	1,600.00
Rush, M.	3/22/23	Review letter from Insurer #25 re Rule 30(b)(6) deposition (1.0); draft response to same (1.6).	2.60	2,145.00
Rush, M.	3/22/23	Review letter from Insurer #33 re Rule 30(b)(6) depositions.	.80	660.00
Bonesteel, A.	3/22/23	Prepare deposition transcripts for attorney review.	1.50	600.00
Leveridge, R.	3/22/23	Review comments from M. Rush and J. Rubinstein re draft response to letter from opposing counsel re Rule 30(b)6 deposition notice (0.4); review additional related communications from co-counsel (0.3).	.70	1,120.00
Leveridge, R.	3/22/23	Confer with co-counsel re litigation strategy and issues (0.8), confer with opposing counsel re same (0.2).	1.00	1,600.00
Ogrey, S.	3/22/23	Research witness for Insurer #24.	1.50	397.50
Agwu, I.	3/22/23	Revise draft of requests for production of documents for Insurer #18.	.40	210.00
Dougherty, J.	3/22/23	Review deposition transcripts for key issues in adversary proceeding (5.0); confer with J. Rubinstein re same (0.7).	5.70	4,702.50
Shore, R.	3/23/23	Confer with J. Rubinstein and R. Leveridge re litigation strategy.	.20	320.00
Shore, R.	3/23/23	Confer with co-counsel re adversary proceeding strategic issues.	1.10	1,760.00
Rubinstein, J.	3/23/23	Confer with M. Rush re discovery strategy (0.3); communicate with R. Leveridge re discussion with insurer counsel (0.3); review co-counsel edits to Rule 30(b)(6) discovery correspondence (0.2); research re Insurer #24 Rule 30(b)(1) witness research (0.3); confer with R. Shore and R. Leveridge re litigation strategy (0.2); confer with co-counsel re strategy (partial) (0.5); provide comments to requests for production to Insurers #18, #19, and #20 (0.2).	2.00	2,000.00
Rush, M.	3/23/23	Draft response to letter from Insurer #25 re Rule 30(b)(6) depositions (3.7); confer with J. Rubinstein re same (0.3).	4.00	3,300.00



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Name	Date	Services	Hours	Amount
Bonesteel, A.	3/23/23	Prepare deposition transcripts for attorney review.	2.40	960.00
Leveridge, R.	3/23/23	Review material to prepare for call with J. Davis (opposing counsel) and P. Breene (Debtors' counsel) re case management issues (0.5); confer with J. Davis and P. Breene re same (0.5); communications with P. Breene re follow up to same (0.4); confer with co-counsel re same (0.6); confer with R. Shore and J. Rubinstein re same (0.2).	2.20	3,520.00
Leveridge, R.	3/23/23	Confer with co-counsel re Consulting Expert A analysis (0.3); review analysis (0.4).	.70	1,120.00
Turner, C.	3/23/23	Review and organize exhibits for Deponents #1 through #20.	.20	45.00
Dougherty, J.	3/23/23	Continue review of deposition transcripts re key issues in case.	5.20	4,290.00
Shore, R.	3/24/23	Confer with J. Rubinstein and A. Gaske re National Union policy stipulation.	.60	960.00
Rubinstein, J.	3/24/23	Correspond with Consulting Expert A and co-counsel re project scope (0.2); analysis re National Union policy stipulation project (0.3); confer with R. Shore and A. Gaske re same (0.6); review deposition scheduling (0.2); review Rule 30(b)(6) correspondence (0.2); review production correspondence (0.2); provide edits to request for production to Insurers #18, #19, and #20 (0.3); review documents re Issue #69 (0.5).	2.50	2,500.00
Gaske, A.	3/24/23	Review open questions on National Union proposed policy pages re policy stipulation (0.3); confer with R. Shore and J. Rubinstein re same (0.6); revise National Union policy comparison spreadsheet per conversation (0.3).	1.20	870.00
Leveridge, R.	3/24/23	Communication with co-counsel re expert analysis budget.	.40	640.00
Leveridge, R.	3/24/23	Review materials re Issue #69.	1.20	1,920.00
Leveridge, R.	3/24/23	Review communications from opposing counsel re availability of insurer witnesses for deposition.	.30	480.00
Turner, C.	3/24/23	Review and organize Deponent #5 deposition exhibits.	.30	67.50
Dougherty, J.	3/24/23	Continue reviewing deposition transcripts re issues in adversary proceeding.	4.70	3,877.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	3/27/23	Correspond with co-counsel re draft responses to Insurers #18, #19, and #20 request for production (0.1); confer with R. Leveridge re strategy and open tasks (0.6); communicate with M. Rush re Rule 30(b)(6) discovery correspondence (0.1); correspond with co-counsel re Issue #69 (0.3); continue review of materials re same (1.2); review revised notice of deposition of Deponent #16 (0.2); review discovery correspondence and analysis re offensive and defensive deposition projects (2.6); analysis re deposition summary process (0.5).	5.60	5,600.00
Rush, M.	3/27/23	Confer with co-counsel re deposition notices.	.30	247.50
Rush, M.	3/27/23	Revise letter to Insurers #18, #19, and #20 re deposition.	.90	742.50
Rush, M.	3/27/23	Communicate with J. Rubinstein re status of insurer responses to 2/6 letter.	.40	330.00
Rush, M.	3/27/23	Communicate with counsel for Insurers #5, #15, and #24 re Rule 30(b)(6) responses.	.30	247.50
Gaske, A.	3/27/23	Review deposition transcripts for Insurers #9 and #23 re response to Rule 30(b)(6) objections.	1.60	1,160.00
Gaske, A.	3/27/23	Correspond with A. Crawford re status of Liberty policy stipulation.	.10	72.50
Gaske, A.	3/27/23	Analyze documents and draft agreement with Insurer #12.	.50	362.50
Leveridge, R.	3/27/23	Confer with J. Rubinstein re status of projects in case.	.60	960.00
Leveridge, R.	3/27/23	Communicate with J. Rubinstein and M. Rush re discovery issues and deposition summary project.	.60	960.00
Leveridge, R.	3/27/23	Communicate with J. Rubinstein re Issue #69.	.20	320.00
Ogrey, S.	3/27/23	Draft second supplemental Rule 30(b)(1) notice to Deponent #16.	.50	132.50
Sraders, S.	3/27/23	Correspond with R. Shore and M. Rush re status of Rule 30(b)(6) letters and Insurer #36.	.30	217.50
Turner, C.	3/27/23	Revise Insurer #20 Rule 30(b)(6) letter.	2.10	472.50
Turner, C.	3/27/23	Review and organize Navigators' amended answer and affirmative defenses.	.40	90.00
Poz, N.	3/27/23	Organize co-plaintiffs' 48th supplemental production.	.40	140.00
Poz, N.	3/27/23	Review co-plaintiffs' deposition calendar.	.40	140.00
Dougherty, J.	3/27/23	Review communications between opposing and plaintiffs' counsel re Rule 30(b)(6) deposition proposals and objections (0.6); continue review of deposition transcripts re key issues in adversary proceeding (5.8).	6.40	5,280.00

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Name	Date	Services	Hours	Amount
Shore, R.	3/28/23	Confer with R. Leveridge and J. Rubinstein re Issue #69 issues (0.6); analysis re same (0.6).	1.20	1,920.00
Rubinstein, J.	3/28/23	Complete initial review of pleading re Issue #69 (0.8); communicate with I. Agwu re deposition summaries and follow up tasks re same (0.8); confer with R. Shore and R. Leveridge re Issue #69 strategy (0.6); revise draft request for production responses to Insurers #18, #19, and #20 (0.8).	3.00	3,000.00
Rush, M.	3/28/23	Review insurers' Rule 30(b)(6) communications.	.80	660.00
Gaske, A.	3/28/23	Revise plaintiffs' response to Insurers #18, #19 and #20 document requests.	1.30	942.50
Leveridge, R.	3/28/23	Communicate with co-counsel re Issue #69 (0.4); analysis re same (0.3); confer with R. Shore and J. Rubinstein re same (0.6).	1.30	2,080.00
Leveridge, R.	3/28/23	Review communication from opposing counsel re call to address management issue (0.2); communicate with co-counsel re same (0.2); communicate with R. Shore and J. Rubinstein re same (0.2).	.60	960.00
Agwu, I.	3/28/23	Confer with J. Rubinstein re deposition transcript summaries.	.50	262.50
Poz, N.	3/28/23	Review and organize correspondence from Insurers #5 and #36.	.20	70.00
Dougherty, J.	3/28/23	Continue reviewing deposition transcripts re key issues in adversary proceeding.	5.40	4,455.00
Shore, R.	3/29/23	Confer with R. Leveridge and J. Rubinstein re Issue #69 strategy and next steps.	1.40	2,240.00
Shore, R.	3/29/23	Review correspondence from A. Gaske re draft agreement with Insurer #12.	.30	480.00
Rubinstein, J.	3/29/23	Confer with R. Leveridge and R. Shore re strategy re Issue #69 (1.4); revise request for production responses (0.4); correspond with M. Rush re service of Rule 30(b)(1) deposition notice of Deponent #16 (0.2); review correspondence re Rule 30(b)(6) discovery correspondence from insurers (0.7).	2.70	2,700.00
Rush, M.	3/29/23	Draft response to Insurer #25 letter re Rule 30(b)(6) depositions.	.80	660.00
Gaske, A.	3/29/23	Communicate with co-counsel re proposed policy pages for National Union policy stipulation.	.10	72.50
Gaske, A.	3/29/23	Revise agreement with Insurer #12.	2.50	1,812.50
Leveridge, R.	3/29/23	Review materials and issues re Issue #69 (0.4); confer with R. Shore and J. Rubinstein re same (1.4); communicate with co-counsel re same (0.2).	2.00	3,200.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	3/29/23	Communicate with co-counsel re discovery responses.	.30	480.00
Leveridge, R.	3/29/23	Communicate with co-counsel and opposing counsel re case management issues.	.40	640.00
Sraders, S.	3/29/23	Confer with A. Gaske re plan documents.	.20	145.00
Huddleston, D.	3/29/23	Confer with J. Dougherty re status of drafting history document review and next steps.	.20	105.00
Shore, R.	3/30/23	Confer with insurers re case management issue (0.4); confer with R. Leveridge re same (0.3).	.70	1,120.00
Shore, R.	3/30/23	Confer with UCC counsel re Issue #69 strategy (0.8); analysis re same (0.9).	1.70	2,720.00
Rubinstein, J.	3/30/23	Communicate with co-counsel re strategy (0.3); correspond with M. Rush re analysis of Insurer #25 pleadings (0.2); correspond with I. Agwu re request for production directed re Insurers #18, #19, and #20 (0.2); correspond with co-counsel re Liberty policy stipulation (0.2); review multiple insurer correspondence re Rule 30(b)(6) issues (0.6); correspond with M. Rush re responses to same (0.1); confer with insurer counsel re case status and next steps (0.4); confer with UCC counsel re strategy (0.8).	2.80	2,800.00
Rush, M.	3/30/23	Update analysis of insurer affirmative defenses and responses to complaint.	.80	660.00
Leveridge, R.	3/30/23	Communicate with co-counsel re call with insurers re schedule (0.3); review notes in preparation for call with insurers (0.4); confer with insurers re same (0.4); communicate with R. Shore re call with insurers (0.5).	1.60	2,560.00
Leveridge, R.	3/30/23	Confer with counsel for UCC, R. Shore and J. Rubinstein re Issue #69 (0.8); confer with R. Shore re same (0.4).	1.20	1,920.00
Dougherty, J.	3/30/23	Continue reviewing deposition transcripts re key issues in adversary proceeding.	2.50	2,062.50
Gilbert, S.	3/31/23	Confer with R. Shore re adversary proceeding, insurance recovery strategy, and next steps.	.90	1,755.00
Shore, R.	3/31/23	Confer with S. Gilbert re litigation update, strategy and next steps.	.90	1,440.00
Shore, R.	3/31/23	Review documents re Issue #69 (0.9); analysis re next steps with co-counsel re same (1.3).	2.20	3,520.00
Rubinstein, J.	3/31/23	Confer with R. Leveridge re strategy (0.9); analysis of documents re Issue #69 (1.8).	2.70	2,700.00
Rush, M.	3/31/23	Research issues re Issue #14.	.40	330.00

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Name	Date	Services	Hours	Amount
Gaske, A.	3/31/23	Correspond with co-plaintiffs re National Union policy stipulation spreadsheet.	.20	145.00
Leveridge, R.	3/31/23	Communicate with M. Rush and J. Rubinstein re MDL material.	.20	320.00
Leveridge, R.	3/31/23	Confer with J. Rubinstein re call with UCC re case administration (0.9); communicate with M. Rush re legal research project re claims (0.4).	1.30	2,080.00
Leveridge, R.	3/31/23	Communicate with Consulting Expert A re status of project.	.40	640.00
Sraders, S.	3/31/23	Analyze spreadsheet of defenses raised by insurers.	.20	145.00
Huddleston, D.	3/31/23	Communicate with J. Dougherty re follow up re review of drafting history documents re Issue #66.	.10	52.50
Poz, N.	3/31/23	Review letter from Insurer #24 re discovery.	.20	70.00
Dougherty, J.	3/31/23	Continue reviewing deposition transcripts re key issues in case.	1.60	1,320.00
		Project Total:	476.70	\$ 429,285.00
<b>TOTAL CHARGEABLE HOURS</b>			<b>503.20</b>	
<b>TOTAL FEES</b>				<b>\$ 457,540.00</b>

#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	10.80	1,950.00	21,060.00
Shore, R.	36.40	1,600.00	58,240.00
Girgenti, J.	17.80	400.00	7,120.00
Rubinstein, J.	10.10	500.00	5,050.00
Rubinstein, J.	83.90	1,000.00	83,900.00
Rush, M.	50.50	825.00	41,662.50
Bonesteel, A.	5.40	400.00	2,160.00
Gaske, A.	38.90	725.00	28,202.50
Leveridge, R.	60.40	1,600.00	96,640.00
Ogrey, S.	4.50	265.00	1,192.50
Sraders, S.	7.00	725.00	5,075.00
Turner, C.	21.50	225.00	4,837.50
Hubbard, B.	8.80	500.00	4,400.00
Huddleston, D.	10.00	525.00	5,250.00
Agwu, I.	46.60	525.00	24,465.00
Poz, N.	13.60	350.00	4,760.00
Dougherty, J.	77.00	825.00	63,525.00
<b>TOTALS</b>	<b>503.20</b>		<b>\$ 457,540.00</b>

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## TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	4.00	900.00
A008	Hearings	1.70	2,175.00
A009	Meetings / Communications with AHC	4.90	8,820.00
A015	Non-Working Travel (Billed @ 50%)	10.10	5,050.00
A019	Plan / Disclosure Statement	5.80	11,310.00
A020	Insurance Adversary Proceeding	476.70	429,285.00

## EXPENSE DETAILS

### E107: Delivery Services/Messenger

Date	Description	Task	Amount
2/24/23	Messenger & Delivery / United Parcel Service / Reed Smith LLP / 2023.02.24	E107	108.44
2/27/23	Messenger & Delivery / United Parcel Service / Reed Smith LLP / 2023.02.27	E107	113.71
<b>Sub-Total of Expenses:</b>			<b>\$ 222.15</b>

### E110: Out-of-Town Travel

Date	Description	Task	Amount
3/02/23	Travel - Train Fare / Alison Gaske / One-Way (Business Class) from Washington, DC to New York, NY / Attend Deposition / 2023.02.28-2023.03.02	E110	143.00
3/02/23	Travel - Train Fare / Jason Rubinstein / Roundtrip (Business Class) from Washington, DC to New York NY / Attend E. Osborne and P. Morin Depositions / 2023.03.01-2023.03.02	E110	513.00
3/02/23	Travel - Parking / Jason Rubinstein / New York NY / Attend E. Osborne and P. Morin Depositions / 2023.03.01-2023.03.02	E110	50.00
3/02/23	Travel - Lodging / Alison Gaske / New York, NY / Attend Deposition / 2023.02.28-2023.03.02	E110	440.76
3/02/23	Travel - Lodging / Jason Rubinstein / New York NY / Attend E. Osborne and P. Morin Depositions / 2023.03.01-2023.03.02	E110	499.00
3/02/23	Travel - Taxi Fare / Alison Gaske / New York, NY / Attend Deposition / 2023.02.28-2023.03.02	E110	70.77
3/02/23	Travel - Taxi Fare / Jason Rubinstein / New York NY / Attend E. Osborne and P. Morin Depositions / 2023.03.01-2023.03.02	E110	24.30
3/02/23	Travel - Meals / Alison Gaske / New York, NY / Attend Deposition / 2023.02.28-2023.03.02	E110	17.24
3/02/23	Travel - Meals / Jason Rubinstein / New York NY / Attend E. Osbourne and P. Morin Depositions / three (3) meals / 2023.03.01-2023.03.02	E110	70.40
<b>Sub-Total of Expenses:</b>			<b>\$ 1,828.47</b>

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**E115: Deposition Transcripts**

<b>Date</b>	<b>Description</b>	<b>Task</b>	<b>Amount</b>
3/01/23	Deposition/Transcript / Veritext / Deposition Transcript of E. Osborne	E115	1,751.70
3/02/23	Deposition/Transcript / Veritext / Video Deposition of P. Morin	E115	684.00
<b>Sub-Total of Expenses:</b>			<b>\$ 2,435.70</b>

**E118: Litigation Support Vendors**

<b>Date</b>	<b>Description</b>	<b>Task</b>	<b>Amount</b>
2/28/23	Contracted Professional Fees - Cobra Legal Solutions LLC / Tech / License/ Hosting: Feb. 2023	E118	931.75
3/31/23	Contracted Professional Fees - Cobra Legal Solutions LLC / Tech / License/ Hosting: March 2023	E118	1,057.75
<b>Sub-Total of Expenses:</b>			<b>\$ 1,989.50</b>
<b>TOTAL EXPENSES</b>			<b>\$ 6,475.82</b>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 464,015.82</b>